


UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

**FILED**  
JUL 20 2009  
  
CLERK

In the Matter of

CIV09- 4107

One Parcel of Property located at  
1908 River Bluff Dr., Brandon,  
Minnehaha County, South Dakota,  
with all appurtenances, fixtures,  
attachments, and improvements thereon,

**MOTION FOR WARRANT  
OF ARREST IN REM/  
APPLICATION FOR  
WARRANT OF ARREST  
IN REM**

Personal Property Described as:  
One LG 50" plasma TV; One Bulova  
G0953 grandfather clock; one game table;  
one Providence 8' pool table with cover and  
floor rack; appliances including one LG  
French door refrigerator; one Bosch double  
oven; one Bosch dishwasher, one GE  
microwave, one Bosch 5-burner gas cook-  
top stove; and fixtures, including but not  
limited to surround sound, including  
speakers and keyboard; draperies, fabric,  
lining, rods, window treatments, blinds;  
and alarm system;

Wells Fargo Bank Account  
#XXXXXXX3385, in the name of  
Christopher J. Reisch;

Great Western Bank Account  
#XXXXXXX4070, in the name of  
Christopher J. Reisch;

Great Western Bank Account  
#XXXXXXX7555, in the name of  
Mike J. Reisch and/or Luverne Sports;

2007 Gold Yukon Denali, VIN  
1GKFK63887J290988, bearing  
SD License 1WC 518;

Certified Mail #7008 2810 0001 7199 6571  
containing \$890 in cash;

Certified Mail #7008 2810 0001 7199 6564  
containing \$410 in cash;

Certified Mail #7008 1300 0001 9567 5880  
containing \$550 in cash;

Certified Mail #7008 1300 0001 9567 5873  
containing \$295 in cash;

Certified Mail #7008 1300 001 9567 6115  
containing \$800 in cash;

Certified Mail #7008 2810 0001 7199 6540  
containing \$1000 in cash;

Certified Mail #7007 1490 0001 6468 7473  
containing \$400 in cash;

Certified Mail #7007 1490 0001 6468 7480  
containing \$1000 in cash;

Certified Mail #7008 2810 0001 7199 6557  
containing \$900 in cash;

Certified Mail #7008 1300 0001 9567 5866  
containing \$2200 in cash;

Certified Mail #7008 2810 0001 7199 6533  
containing \$2000 in cash;

Certified Mail #7008 1300 0001 9567 6122  
containing \$440 in cash;

Certified Mail #7008 2810 0001 7199 6526  
containing \$381 in cash;

Certified Mail #7008 2810 0001 7199 6588  
containing \$300 in cash;

Express Mail #EB825346398US  
containing a total of \$10,000 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Redfield, SD 57469  
containing a \$515 check;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Sioux Falls, SD 57110  
containing a \$720 check;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Sioux Falls, SD 57106  
containing \$58 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Okoboji, IA 51355  
containing \$270 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Hartington, NE 68739  
containing \$120 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Pierre, SD 57501  
containing \$23 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Brookings, SD 57006  
containing \$190 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Hartington, NE 68739  
containing \$90 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Hartington, NE 68739  
containing \$50 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Luverne, MN 56156  
containing \$3 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Edgerton, MN  
containing \$400 in cash;

First Class Mail from 1908 River Bluff Dr.,

Brandon, SD 57005 to Luverne, MN 56156  
containing \$200 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Mason City, IA 50401  
containing \$45 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Waterloo, IA 50703  
containing a \$965 check;

First Class Mail from 1908 River Bluff Dr.  
Brandon, SD 57005 to Chandler, AZ 85248  
containing a \$4,325 check;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Yankton, SD 57078  
containing a \$545 check;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Redfield, SD 57469  
containing a \$955 check and a  
\$1,430 check;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Sioux Falls, SD 57108  
containing \$55 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Pierre, SD 57501  
containing \$50 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Rock Rapids, IA 51246  
containing \$48 in cash;

First Class Mail from 1908 River Bluff Dr.,  
Brandon, SD 57005 to Rock Rapids, IA 51246  
containing \$15 in cash;

\$368,109 in cash;

A \$530 U.S. Postal money order;

Express Mail #EH472668285US  
containing \$12,360 in cash;

Priority Mail #0308 0730 0000 1723 0554  
containing \$2,300 in cash;

Certified Mail #7008 0150 0002 6216 8543  
containing \$950 in cash;

Certified Mail #7008 0500 0000 9969 4148  
containing \$1,610 in cash;

First Class Mail from Sioux Falls, SD 57106  
to Mike Reisch,  
containing \$55 in cash;

First Class Mail from Fargo, ND 58102  
to LSS  
containing a \$115 check;

First Class Mail from Aberdeen, SD 57401  
to Mike Reisch,  
containing \$115 in cash;

First Class Mail from Benson, MN 56215  
to LSS  
containing \$5 in cash;

First Class Mail from Luverne, MN 56156  
to L.S.S.,  
containing \$70 in cash;

First Class Mail from Fargo, ND 58103  
to LSS  
containing a total of \$55 in checks;

First Class Mail from Elyston, MN 56028  
to Mike or Chris Reisch  
containing a \$100 check;

First Class Mail from Sioux Falls, SD 57107  
to Mike Reisch,  
containing a \$460 check;

First Class Mail from Fort Pierre, SD 57532  
to 1908 River Bluff Dr., Brandon, SD 57005,  
containing \$160 in cash;

First Class Mail from Hendrick, MN 56134  
to L.S.S.  
containing \$360 in cash;

3 one-ounce Gold Eagle coins;

1 one-ounce gold maple leaf coin;

1 #5 1901 gold piece;

1 1/10th of an ounce Gold Eagle coin.

Defendants.

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**MOTION FOR WARRANT OF ARREST IN REM /**  
**APPLICATION FOR WARRANT OF ARREST IN REM**

The United States of America, through its counsel, respectfully requests that the Clerk of this Court issue the attached Warrant of Arrest in Rem pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. In support of its application, the United States says the following:

1. On July 20, 2009, the United States filed a complaint for civil forfeiture in rem in the above-referenced case. Among other things, the complaint seeks the forfeiture of the following property to be arrested ("the defendant property"):

a. Wells Fargo Bank Account, #XXXXXX3385, in the name of

Christopher J. Reisch;<sup>1</sup> a check in the amount of \$10,357.26, #0443706852, was seized on April 30, 2009 from the Wells Fargo located at 101 N. Phillips Avenue, Sioux Falls, South Dakota; the check was deposited in the temporary forfeiture account for the U.S. Postal Inspection Service (USPIS). After filing of the complaint, these funds will be transferred to the United States Marshal Service (USMS).

b. Great Western Bank Account, #XXXXXX4070, in the name of Christopher J. Reisch; a check in the amount of \$28,638.82, check # 352265, was seized on April 30, 2009, from the Great Western Bank located at 100 N. Phillips Avenue, Sioux Falls, South Dakota; the check was deposited into the temporary forfeiture account for the USPIS. After filing of the complaint, these funds will be transferred to the USMS.

c. Great Western Bank Account, #XXXXXX7555, in the name of Mike J. Reisch and/or Luverne Sports; a check in the amount of \$20,464.83, check # 352261, was seized on April 30, 2009, from the Great Western Bank located at 100 N. Phillips Avenue, Sioux Falls, South Dakota; the check was deposited in the temporary forfeiture account for the USPIS. After filing of the complaint, these funds will be transferred to the USMS.

d. 2007 Gold Yukon Denali, VIN 1GKFK63887J290988, bearing SD License 1WC 518, as well as original title, registration, keys and any other door opening devices, purchased by Mike J. Reisch and titled in his

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<sup>1</sup> Hereinafter referred to in complaint as "Chris Reisch", "Christopher J. Reisch" or "Christopher Reisch".



name, was seized from the garage of Mike Reisch's residence located at 1908 River Bluff Drive in Brandon, SD, on May 4, 2009. The vehicle is presently in the custody of the U.S. Postal Inspection Service. After the filing of the complaint, the custody of the vehicle will transfer to the USMS.

e. Certified Mail #70081300 0001 9567 5859 from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.H.] [address redacted] Ipswich, SD 57451" containing \$420 in cash and a note stating "+420" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$420 in cash was turned into a check, is presently in the custody of USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

f. Certified Mail #7008 2810 0001 7199 6571 from "1908 River Bluff Dr., Brandon, SD 57005" to "[T.S.] [address redacted] Mason City, IA 50401" containing \$890 in cash and a note stating "[T.] Last Week - 1195, payment +450, +685, This week +950, Balance +890" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$890 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

g. Certified Mail #7008 2810 0001 7199 6564 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.R.] [address redacted] Spencer, IA 51301" containing \$410 in cash and a note stating "[J.] +410" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$410



in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

h. Certified Mail #7008 1300 0001 9567 5880 from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.S.] [address redacted] Ft. Pierre, SD 57532" containing \$550 in cash and a note stating "+550" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$550 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

i. Certified Mail #7008 1300 0001 9567 5873 from "1908 River Bluff Dr., Brandon, SD 57005" to "[L.N.] [address redacted] Ft. Pierre, SD 57532" containing \$295 in cash and a note stating "+295" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$295 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

j. Certified Mail #7008 1300 0001 9567 6115 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.G.] [address redacted] DeSmet, SD 57231" containing \$800 in cash and a note stating "+800" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$800 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this

complaint, the funds will be transferred to the USMS.

k. Certified Mail #7008 2810 0001 7199 6540 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.D.] [address redacted] Sioux Falls, SD 57106" containing \$1000 in cash and a note stating "+1000" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$1000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

l. Certified Mail # 7007 1490 0001 6468 7473 from "1908 River Bluff Dr., Brandon, SD 57005" to "[W.S.] [address redacted] Selby, SD 57472" containing \$400 in cash with a note stating "+400" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$400 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

m. Certified Mail # 7007 1490 0001 6468 7480 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.S.] [address redacted] Spencer, IA 51301" containing \$1000 in cash and a note stating "+1000" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$1000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

n. Certified Mail #7008 2810 0001 7199 6557 from "1908 River Bluff

Dr., Brandon, SD 57005" to "[N.S.] [address redacted] Pierre, SD 57501" containing \$900 in cash and a note stating "+900" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$900 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

o. Certified Mail #7008 1300 0001 9567 5866 from "1908 River Bluff Dr., Brandon, SD 57005" to "[G.M.] [address redacted] Pierre, SD 57501" containing \$2200 in cash and a note stating "+2200" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$2200 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

p. Certified Mail #7008 2810 0001 7199 6533 from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.R.] [address redacted] Omaha, NE 68116" containing \$2000 in cash and a note stating "+2000" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$2000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

q. Certified Mail #7008 1300 0001 9567 6122 from "1908 River Bluff Dr., Brandon, SD 57005" to "[H.G.] [address redacted] Pierre, SD 57501"

containing \$440 in cash, a check from [G.]to Sports Service for \$360,<sup>2</sup> and a note stating “+800” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$440 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

r. Certified Mail # 7008 2810 0001 7199 6526 from “1908 River Bluff Dr., Brandon, SD 57005” to “[T.W.] [address redacted] Sioux Falls, SD 57107” containing \$381 in cash and a note stating “+381” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$381 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

s. Certified Mail # 7008 2810 0001 7199 6588 from “1908 River Bluff Dr., Brandon, SD 57005” to “[C.D.] [address redacted] Mason City, IA 50401” containing \$300 in cash with a note stating “+300” “thanks Mike” and a 2009 Super Bowl betting board; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$300 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

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<sup>2</sup> The \$360 was not included within the seizure warrant but is presently being maintained as evidence.

t. Express Mail #EB825346398US from "Mike Reisch, 1908 River Bluff Dr., Brandon, SD 57005" to "[P.B.] [address redacted] Watertown, SD 57201" containing a white 9 inch by 12 inch envelope with 2 letter sized envelopes each marked "5.0" in top right corner each with \$5,000 in cash, for a total of \$10,000; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$10,000 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

u. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.L.] [address redacted] Redfield, SD 57469" containing a note stating "Bal +500" "Pd 515" "Bal -15" "thanks Mike" and a \$515 check from D.L. and C.L. made out to cash; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$515 check is presently in the custody of the USPIS.

v. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[S.S.] [address redacted] Sioux Falls, SD 57110" containing a check for \$720 from the Christopher Reisch Wells Fargo Bank Account #XXXXXX3385; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$720 check is presently in the custody of the USPIS.

w. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[L.G.] [address redacted] Sioux Falls, SD 57106" containing \$58 in cash with a note stating "+58" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$58 in cash was turned into a check, is

presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

x. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[R.V.] [address redacted] Okoboji, IA 51355" containing \$270 in cash with a note stating "+270" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$270 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

y. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[L.P.] [address redacted] Hartington, NE 68739" containing \$120 in cash with a note stating "+120" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$120 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

z. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[J.S.] [address redacted] Pierre, SD 57501" containing \$23 in cash and a note stating "+22.50" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$23 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred



to the USMS.

aa. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[S.N.] [address redacted] Brookings, SD 57006" containing \$190 in cash and a note stating "+190" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$190 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

bb. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[D.S.] [address redacted] Hartington, NE 68739" containing \$90 in cash and a note stating "+90" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$90 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

cc. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[C.S.] [address redacted] Hartington, NE 68739" containing \$50 in cash and a note stating "+50" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$50 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

dd. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to

“[J.R.] [address redacted] Luverne, MN 56156” containing \$3 in cash and a note stating “+3” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$3 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ee. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[V.K.] [address redacted] Edgerton, MN 56128” containing \$400 in cash with a note stating “+400” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$400 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ff. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[T.K.] [address redacted] Luverne, MN 56156” containing \$200 in cash with a note stating “+200” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$200 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

gg. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[T.S.] [address redacted] Mason City, IA 50401” containing \$45 in cash and a note stating “+45” “thanks Mike”; seized after mailed pursuant to a search

warrant dated January 22, 2009. The \$45 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

hh. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[M.L.] [address redacted] Waterloo, IA 50703" containing a check for \$965 from the Wells Fargo Bank account #xxxxxxx3385 belonging to Christopher Reisch and a note stating "+965" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The check is presently in the custody of the USPIS.

ii. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[S.G.] [address redacted] Chandler, AZ 85248" containing a \$4325 check from the Great Western Bank account #xxxxxxx4070 belonging to Christopher Reisch and a note stating "[S.] +4325" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$4,325 check is presently in the custody of the USPIS.

jj. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to "[W.S.] [address redacted] Yankton, SD 57078" containing a \$545 check from the Great Western Bank account #xxxxxxx4070 belonging to Christopher Reisch and a note stating "+545" "thanks Mike"; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$545 check is presently in the custody of the USPIS.

kk. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005" to

“[D.W.] [address redacted] Redfield, SD 57469” containing a \$955 check from D.W. to Mike Reisch, a \$1430 check from the Great Western Bank account #xxxxxxx4070 belonging to Christopher Reisch, and a note stating “+2385” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The checks are presently in the custody of the USPIS.

ll. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[J.B.] [address redacted] Sioux Falls, SD 57108” containing \$55 in cash and a note stating “[J.]” “This week +665” “Last Week -610” “+55” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$55 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

mm. First Class Mail from “1908 River Bluff Dr., Brandon, SD 57005” to “[V.L.] [address redacted] Pierre, SD 57501” containing \$50 in cash and a note stating “[V.] +50” “thanks Mike”; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$50 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

nn. \$368,109 in cash which was seized from the home where Michael J. Reisch, Sr., a/k/a Mike Reisch and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, SD 57005 on January 22, 2009, pursuant to a search warrant and was seized pursuant to a seizure warrant dated April 30, 2009; the cash

was photographed and turned into a check which is presently in the custody of the U.S. Postal Inspection Service and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

oo. A \$530 U.S. Postal money order serial number 16029393232 dated January 21, 2009, seized on January 22, 2009, from the home in which Mike Reisch resided, 1908 River Bluff Dr., Brandon, South Dakota. The money order was also seized pursuant to the seizure warrant dated April 30, 2009, and is presently in the custody of the USPIS.

pp. Express Mail #EH472668285US from "[T.H.] [address redacted] Detroit Lakes, MN" to "LFS, PO Box 2494, Sioux Falls, SD 57101" containing \$12,360 in cash; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$12,360 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

qq. Priority Mail with delivery confirmation #0308 0730 0000 1723 0554 from "[address redacted] Arnolds Park, IA 51331" to "LSS, PO Box 2494, Sioux Falls, SD 57101" containing white envelope with \$2300 in cash and a note on the outside of the envelope stating "Thanks Mike and Chris" "[J.C.]"; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$2300 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing



of this complaint, the funds will be transferred to the USMS.

rr. Certified Mail #7008 0150 0002 6216 8543 from “[address redacted] Spencer, IA 51301” to “L.S.S., PO Box 2494, Sioux Falls, SD 57101” containing \$950 in cash and a note stating “Mike here is 950, I’ll send more in 2 weeks and rest of what I owe you when I get my tax return.” “Thanks [K.G.]”; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$950 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ss. Certified Mail #7008 0500 0000 9969 4148 from “[C.W.] [address redacted] Sibley, IA 51249-7000” to “L.L.S., PO Box 2494, Sioux Falls, SD 57101” containing \$1610 in cash and a note stating “Hey Mike-Will send more when I get to town to bank” “[C.]”; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$1610 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

tt. First Class Mail from “[J.C.] [address redacted] Sioux Falls, SD 57106” to Mike Reisch, 1908 River Bluff Dr, Brandon, SD 57005” containing \$55 in cash and a note stating “[J.C.] \$55”; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$55 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be



transferred to the USMS.

uu. First Class Mail from "[L.W.] [address redacted] Fargo, ND 58102" to "LSS, PO Box 2494, Sioux Falls, SD 57101" containing a check from L.W. to LSS for \$115; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$115 check is presently in the custody of the USPIS.

vv. First Class Mail from "G. [T.] [address redacted] Aberdeen, SD 57401" to "Mike Reisch, 1908 River Bluff Dr., Brandon, SD 57005" containing \$115 in cash and a note stating "From [G.] T." "Week end 1-19, 115" "GT"; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$115 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ww. First Class Mail from "[J. & J.S.] [address redacted] Benson, MN 56215" to "LSS, PO Box 2494, Sioux Falls, SD 57101" containing \$5 in cash; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$5 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

xx. First Class Mail from "[M.L.] [address redacted] Luverne, MN 56156" to "L.S.S., PO Box 2494, Sioux Falls, SD 57101" containing \$70 in cash and a note stating "Mike & Chris" "I owe 70.00" "Thanks [M.L.]"; seized after mailed pursuant to a search warrant dated January 27, 2009. The \$70 in cash was turned into a check, is presently in the custody of the USPIS, and has

been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

yy. First Class Mail from “[R.] [address redacted] Fargo, ND 58103” to “L.S.S., PO Box 2494, Sioux Falls, SD 57101” containing 2 checks made out to 5-Star from D.R. for the amount of \$25 and from K.R. for the amount of \$30; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$55 in checks is presently in the custody of the USPIS.

zz. First Class Mail from “[R.T.] [address redacted] Elyston, MN 56028” to “Mike or Chris Reisch, 1908 River Bluff Dr., Brandon, SD 57005” containing a check made out to cash for \$100 and a note stating “Thanks Guys!” “[R.]”; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$100 check is presently in the custody of the USPIS.

aaa. First Class Mail from “[J.C., W.A.] [address redacted] Sioux Falls, SD 57107” to “Mike Reisch, 1908 River Bluff Dr., Brandon, SD 57005” containing a check made out to Mike Reisch for \$460 and a note stating “To Mike” “From [J.C.]”; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$460 check is presently in the custody of the USPIS.

bbb. First Class Mail from “[J.G.], [address redacted] Fort Pierre, SD 57532-0685” to “1908 River Bluff Dr, Brandon, SD 57005” containing \$160 in cash and a white envelope addressed to J.G. with a return address of 1908 River Bluff Dr., Brandon, SD 57005; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$160 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its

temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ccc. First Class Mail from "[D.K.] [address redacted] Hendrick, MN 56134" to "L.S.S., PO Box 2494, Sioux Falls, SD 57101" containing \$360 in cash and a note stating "Thanks Mike" "Get rest after Super Bowl" "Thanks [D.K.]"; seized after mailed pursuant to a search warrant dated February 18, 2009. The \$360 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

ddd. Three (3) one-ounce Gold Eagle coins seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The three coins are presently in the custody of the U.S. Postal Inspection Service.

eee. 1 one-ounce gold maple leaf coin seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The coin is presently in the custody of the USPIS.

fff. 1 #5 1901 gold coin seized from the residence where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The coin is presently in the custody of the USPIS.

ggg. 1 1/10th of an ounce Gold Eagle coin seized from the residence

where Michael Reisch, Sr. and Kathryn Reisch reside, 1908 River Bluff Dr., Brandon, South Dakota, on January 22, 2009 pursuant to a search warrant. The coin is presently in the custody of the USPIS.

hhh. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005", to "[H.M.] [address redacted], Rock Rapids, IA 51246" containing \$48 in cash; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$48 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

iii. First Class Mail from "1908 River Bluff Dr., Brandon, SD 57005", to "[G.M.] [address redacted], Rock Rapids, IA 41246", containing \$15 in cash; seized after mailed pursuant to a search warrant dated January 22, 2009. The \$48 in cash was turned into a check, is presently in the custody of the USPIS, and has been deposited in its temporary forfeiture account. After filing of this complaint, the funds will be transferred to the USMS.

2. The defendant property is in the possession, custody and control of the United States, to wit: United States Postal Inspection Service, which obtained such possession, custody and control on January 22, 2009; January 27, 2009; and February 18, 2009, pursuant to a search warrant and/or pursuant to a seizure warrant dated April 30, 2009.

3. Supplemental Rule G(3)(b)(i) provides that if property is subject to forfeiture in a civil forfeiture case, and the property is in the Government's possession, custody or control, the clerk "must issue a warrant to arrest the


property.”

4. The United States does not possess at this time nor does it seek to arrest the real property listed in the forfeiture complaint as well as the personal property which the United States believes is maintained within the real property.

WHEREFORE, the United States respectfully requests that the Clerk of the Court issue the attached warrant of arrest in rem.

Dated: July 19, 2009.

MARTY J. JACKLEY  
United States Attorney

  
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